

The Honorable James L. Robart

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

KATHERINE MOUSSOURIS, HOLLY
MUENCHOW, and DANA PIERMARINI, on
behalf of themselves and a class of those
similarly situated,

Plaintiff,

v.

MICROSOFT CORPORATION,

Defendant.

Case No. 2:15-cv-01483-JLR

**JOINT STATEMENT AND
~~PROPOSED~~ ORDER RE CLASS
DISCOVERY AND BRIEFING
SCHEDULE AND PROPOSED
REDACTIONS TO THE COURT'S
ORDER**



CLASS DISCOVERY AND BRIEFING SCHEDULE

Pursuant to the Court's April 11, 2017 Order (Dkt. # 176) and July 27, 2017 Order (Dkt. # 223), Plaintiffs Katherine Moussouris, Holly Muenchow and Dana Piermarini, and Defendant Microsoft Corporation, by and through their respective counsel, respectfully propose the following class discovery and class certification deadlines:

1. The deadline for Defendant to complete production of revised privilege logs pursuant to Special Master Michelle Peterson's Report and Recommendation [Dkt. No. 196 (preliminarily sealed)] is August 14, 2017.

2. The deadline for the Parties to complete meet and confer on the completeness of production of the newly-produced documents and documents flagged by the Special Master in the revised privilege logs is August 28, 2017. (The Special Master may complete her work after that date, if needed.)

3. The deadline to complete the two remaining 30(b)(6) depositions - on the topics of internal gender audits and internal employee complaints - is September 22, 2017.

4. The deadline for Plaintiffs to file their motion for class certification and opening expert reports and produce expert data output to Microsoft is October 27, 2017.

5. The dates for Microsoft to depose Plaintiffs' putative class member declarants in support of Plaintiffs' class certification motion are November 6 through 20, 2017.

6. The deadline for Defendant to file its opposition to the motion for class certification and responding expert reports and produce its expert data output to Plaintiffs is January 5, 2018.

7. The dates for Plaintiffs to depose Microsoft's putative class member declarants in support of Microsoft's opposition to Plaintiffs' class certification motion are January 15 through 29, 2018.

8. The deadline for Plaintiffs to file their reply in support of their motion for class certification and rebuttal expert reports is February 9, 2018.

1 9. The deadline for the Parties to file their motions to exclude experts is February
2 23, 2018.

3 10. The deadline for the Parties to file their oppositions to the motions to exclude
4 experts is March 9, 2018.

5 11. The deadline for the Parties to file their replies in support of their motions to
6 exclude experts is March 16, 2018.

7 12. The deadline for Defendant to file its motion for summary judgment of the
8 named Plaintiffs' claims is March 15, 2018, to be noted for April 6, 2018 pursuant to Local
9 Rule 7(d)(3) regarding fourth Friday motions.

10 13. The deadline for Plaintiffs to file their opposition to Microsoft's motion for
11 summary judgment is April 2, 2018.

12 14. The deadline for Microsoft to file its reply in support of its motion for summary
13 judgment is April 6, 2018.

14 **REDACTIONS TO COURT ORDER (DKT. # 223)**

15 Pursuant to the Court's July 27, 2017 Order (Dkt. # 223), the parties met and conferred
16 to jointly determine which portion of the Court's Order to redact. Counsel for Microsoft sent
17 its proposed redactions to Plaintiffs' counsel on August 1, 2017. On August 3, 2017, the
18 parties further met and conferred via teleconference and agreed upon revised redactions.

19 As required by the Court's Order, attached hereto as Exhibit A is a copy of the Order
20 with Microsoft's proposed redactions, which Plaintiffs do not object to. Specifically,
21 Microsoft requests that the following portions of the Order be sealed: Page 3 lines 2-7, 11-13,
22 20-22; page 7 lines 4-5, 21-22.

1 Dated: August 7, 2017

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9 Dated: August 7, 2017

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17 Dated: August 7, 2017

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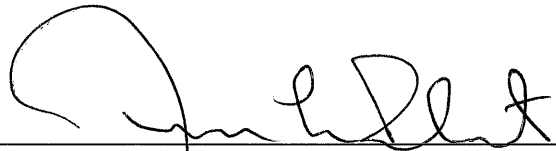
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~~PROPOSED~~ ORDER

IT IS SO ORDERED.

Dated: 10 August 2017


The Honorable Judge James L. Robart

CERTIFICATE OF SERVICE

I hereby certify that on August 7, 2017, I caused the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of the filing to all counsel of record.

DATED: August 7, 2017

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